

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

ANNETTE RODRIGUEZ,
Plaintiff

v.

THE CITY OF CORPUS CHRISTI,
PAULETTE GUAJARDO,
PETER ZANONI,
STEVEN VIERA
AND EYVON MCHANEY,
Defendants

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CIVIL ACTION NO. 2:21-cv-00297

DEFENDANTS' NOTICE OF INTENT TO FILE
RESPONSE IN OPPOSITION TO PLAINTIFF'S APPLICATION FOR
TEMPORARY RESTRAINING ORDER AND INJUNCTIVE RELIEF

TO THE HONORABLE U.S. DISTRICT JUDGE TIPTON:

NOW COME Defendants, the City of Corpus Christi, Paulette Guajardo, Peter Zaroni, Steven Viera, and Eyvon McHaney (collectively, "Defendants"), respectfully file this Notice of Intent to File Defendants' Response In Opposition to Plaintiff's Application for Temporary Restraining Order and Preliminary Injunction, which was incorporated into *Plaintiff's Verified First Amended Complaint, Application for Temporary and Permanent Injunctive Relief, and Request for Declaratory Relief*, filed on February 18, 2022 (D.E. #28).

I.

Defendants hereby notify the Court of their intention to file a brief response, on or before Friday, February 25, 2022, which will address arguments raised in Plaintiff's Application for Temporary Restraining Order (TRO) and other injunctive relief.

II.

Defendants submit that the Response will assist the Court in understanding and deciding the pending issues.

III.

Additionally, Defendants intend to request that the Court exercise its discretion to order a hearing on this matter or, alternatively, a conference to discuss the relief requested by Plaintiff in her application for entry of TRO and other injunctive relief.

PRAYER

Defendants pray that the Court refrain from issuing any ruling on Plaintiff's request for TRO or preliminary injunction until Defendants have filed, and the Court has had an opportunity to review, their Response in Opposition.

Respectfully submitted,

WOOD, BOYKIN & WOLTER, P.C.

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By: /s/ Frederick J. McCutcheon

Frederick J. McCutcheon

ATTORNEY IN CHARGE

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ATTORNEYS FOR DEFENDANTS

NOTICE OF ELECTRONIC FILING

The undersigned counsel hereby certifies that he has electronically submitted for filing a true and correct copy of the above and preceding notice in accordance with the Electronic Case Files System of the Southern District of Texas on the 22nd day of February 2022.

By: /s/ Frederick J. McCutchon
Fredrick J. McCutchon

CERTIFICATE OF SERVICE

I at this moment certify that on this the 22nd day of February 2022, a true and correct copy of the above and preceding notice was served electronically on the known Filing User listed below, through the Notice of Electronic Filing, as indicated below:

Via CM/ECF:

Mr. Bryant S Banes
Ms. Sarah P. Harris
NEEL HOOPER & BANES, P.C.
1800 West Loop South, Ste 1750
Houston, Texas 77027

By: /s/ Frederick J. McCutchon
Fredrick J. McCutchon